

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON

ROSE JOHNSON, as the Personal  
Representative of the ESTATE OF RYAN  
M. SMITH on behalf and all beneficiaries  
MARK SMITH, KAHLEENA A. SMITH,  
LUKE-MICAH JOHNSON, JALONE  
JOHNSON, and ROSE JOHNSON, and  
ROSE JOHNSON, individually,

Plaintiffs,

v.

THE CITY OF SEATTLE, a municipal  
corporation; CHRISTOPHER MYERS, an  
individual; RYAN BEECROFT, an  
individual; DANIEL JOHNSON, an  
individual; and DOES 1 through 50,  
inclusive,

Defendants.

No. 2:22-CV-00609-TSZ

[PROPOSED]

STIPULATION AND ORDER  
EXTENDING DEADLINE TO FILE  
JOINT MOTIONS IN LIMINE

[CLERK'S ACTION REQUIRED]

Note on Motion Calendar: June 27, 2025

**STIPULATION**

COME NOW the parties, by and through undersigned counsel, and hereby respectfully and jointly move the Court for entry of an order continuing the deadline under docket 84 to file Joint Motions in Limine from June 30, 2025, to July 02, 2025. Fed. R. Civ. P. 16(b)(4) provides that a case schedule order may be modified "only for good cause and with the judge's consent." The parties' request is made to accommodate the schedules of counsel to allow sufficient time for briefing the motions. The motions are not set to be heard by the Court until July 18, 2025. (Dkt. 84.) Counsel met and conferred regarding the

STIPULATION AND ORDER EXTENDING DEADLINE  
TO FILE JOINT MOTIONS IN LIMINE - 1  
2:22-CV-00609-TSZ

KEATING, BUCKLIN & MCCORMACK, INC., P.S.  
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SEATTLE, WASHINGTON 98104  
PHONE: (206) 623-8861  
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1 Joint Motions in Limine on the morning of June 27, 2025.

2  
3 Dated: June 27, 2025

SULLIVAN LAW GROUP, PLLC

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5  
6 /s/ Brian M. Sullivan

Brian M. Sullivan, WSBA #38066  
Attorney for Plaintiff

7  
8  
9 Dated: June 27, 2025

KEATING, BUCKLIN & McCORMACK, INC., P.S.

10  
11 /s/ Thomas P. Miller

Thomas P. Miller, WSBA #34473  
Attorney for Defendants City of Seattle, Chris  
Myers, and Ryan Beecroft

12  
13  
14 Dated: June 27, 2025

LAW OFFICE OF JOSEPH ROME, INC., P.S.

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17 /s/ Joseph Rome

Joseph Rome, WSBA #37651  
Attorney for Plaintiff

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20 **ORDER**

21 PURSUANT TO THE FOREGOING STIPULATION, IT IS ORDERED that good  
22 cause exists and the deadline to file Joint Motions in Limine be continued from June 30,  
23 2025, to July 02, 2025.

24 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

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27 THE HONORABLE THOMAS S. ZILLY